

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

COPY

In the Matter of)

Federal-State Joint Board on)
Universal Service)

NPCR, INC. d/b/a NEXTEL PARTNERS)

Petition for Designation as an)
Eligible Telecommunications Carrier)
in the State of Georgia)
_____)

File No. _____

CC: 96-45

RECEIVED

MAY 14 2004

Federal Communications Commission
Office of the Secretary

PETITION FOR DESIGNATION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER
IN THE STATE OF GEORGIA

NPCR, INC. d/b/a NEXTEL PARTNERS

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Date: July 10, 2003

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- 2. Letter from Georgia Public Service Commission Declining Jurisdiction
- 3. Coverage Map Showing Nextel Partners’ Service Area
- 4. Declaration of Donald J. Manning, Esq.
- 5. High Cost, Interstate Access and Interstate Common Line Support Annual Certifications

SUMMARY

Nextel Partners is seeking designation as an Eligible Telecommunications Carrier pursuant to Section 214(e)(6) of the Communications Act of 1934, as amended (the "Act") in certain Designated Areas in the State of Georgia, including both study areas of rural telephone companies and non-rural ILEC wire centers covered in their entirety.

Designation of Nextel Partners as an Eligible Telecommunications Carrier is appropriate, since Nextel Partners meets all of the criteria set forth in Section 214 of the Act, and in Part 54 of the Commission's Rules. In addition, designation of Nextel Partners as an ETC in the indicated rural telephone company study areas is supported by the public interest in light of the innovative services and consumer choice that Nextel Partners' presence can bring to bear in those areas.

**Before the
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In the Matter of)

Federal-State Joint Board on)
Universal Service)

File No. _____

NPCR, INC. d/b/a NEXTEL PARTNERS)

Petition for Designation as an)
Eligible Telecommunications Carrier)
in the State of Georgia)
_____)

**PETITION FOR DESIGNATION AS AN
ELIGIBLE TELECOMMUNICATIONS CARRIER
IN THE STATE OF GEORGIA**

NPCR, Inc. d/b/a Nextel Partners, a wholly-owned indirect subsidiary of Nextel Partners, Inc., a publicly-traded company ("Nextel Partners"), by its undersigned counsel and pursuant to Section 214(e)(6) of the Communications Act of 1934, as amended (the "Act"), hereby submits this Petition for Designation ("Petition") as an eligible telecommunications carrier ("ETC") in the State of Georgia. Nextel Partners provides wireless telecommunications services throughout certain designated areas (the "Designated Areas") of the State of Georgia. Nextel Partners seeks designation as an ETC for both study areas of rural telephone companies as defined in Section 153(37) of the Act, as well as wire centers of non-rural incumbent LECs.¹ As demonstrated herein, and certified in Attachment 1 to this Petition, Nextel Partners meets all of the requirements for designation as an ETC in each of these Designated Areas and respectfully requests that the Federal Communications Commission (the "Commission") promptly grant this Petition.

¹ A list of the rural telephone company study areas and non-rural incumbent LEC wire centers for which Nextel Partners seeks designation in this Petition (also referred to herein as the "Designated Areas") is set forth as Attachment 1 hereto.

I. Nextel Partners Meets All the Requirements for Designation as an Eligible Telecommunications Carrier to Serve the Designated Areas in the State of Georgia

Under Section 214(e)(6) of the Act, 47 U.S.C. § 214(e)(6), the Commission, consistent with the public interest, convenience and necessity, may, with respect to an area served by a rural telephone company, and shall, in all other cases, designate more than one common carrier as an ETC for a designated service area, so long as the requesting carrier meets the requirements of Section 214(e)(1) of the Act. As demonstrated below, and as set forth in the declaration of Donald Manning, **Attachment 4** hereto, Nextel Partners meets each of these requirements.

A. Nextel Partners Will Provide Service Over its Own Facilities

Nextel Partners has sufficient wireless network infrastructure facilities and capacity to provide supported services throughout the Designated Areas in the State of Georgia over its own facilities.

B. Nextel Partners Offers All Required Services and Functionalities

Nextel Partners offers, or will offer upon designation as an ETC in the Designated Areas, all of the services and functionalities required by Section 54.101(a) of the Commission's Rules, 47 C.F.R. § 54.101(a), including the following:

1. **Voice grade access to the public switched telephone network.** Voice grade access to the public switched telephone network ("PSTN") means the ability to make and receive traditional voice phone calls, within a bandwidth of approximately 3500 Hertz.² Nextel Partners' voice grade access enables a user of telecommunications services to transmit voice communications, including signaling the network that the caller wishes to place a call, and to

² See *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, First Report and Order, 12 FCC Rcd 8776 at 8810-11 ("USF Order").

receive voice communications, including receiving a signal indicating there is an incoming call. The bandwidth for Nextel Partners' voice grade access is, at a minimum, 300 to 3,000 Hertz.

2. **Local Usage.** As part of the voice grade access to the PSTN, an ETC must provide local calling. Nextel Partners, through its wireless network, provides subscribers the ability to send and receive local phone calls both over Nextel Partners' network and through interconnection with the incumbent local exchange carriers serving the Designated Areas. Local usage is included in all of Nextel Partners' calling plans. As a designated ETC, Nextel Partners will comply with any and all minimum local usage requirements required by applicable law.

3. **Dual tone multi-frequency ("DTMF") signaling or its functional equivalent.** DTMF signaling allows carriers to provide expeditious call setup, and enables modem usage.³ Nextel Partners uses out-of-band signaling and in-band multifrequency signaling that is functionally equivalent to DTMF.

4. **Single-party service or its functional equivalent.** Nextel Partners provides customers with single-party access for the duration of every phone call. Nextel Partners does not provide "multi-party" or "party line" services.

5. **Access to 911 and E911 emergency service.** The FCC has declared that access to emergency services is essential.⁴ Nextel Partners provides universal access to the 911 system for its customers, and has implemented and will continue to implement E911 services consistent with the FCC's Rules and Orders and local PSAP requests. As of February 1, 2003, Nextel Partners has received requests for, and has launched, seven Georgia counties at Phase I with one county pending. Nextel Partners has received no requests at this time for Phase II service.

³ *USF Order* at 8814.

⁴ *Id.* at 8815.

6. **Access to operator services.** Nextel Partners offers all of its customers access to operator services, in accordance with the Commission's requirements.

7. **Access to interexchange service ("IXC").** Nextel Partners customers can use the Nextel Partners network for IXC access to place long distance phone calls. Access is through interconnection agreements with several IXC carriers. Nextel Partners' customers can also reach their IXC of choice by dialing the appropriate access code.

8. **Access to directory assistance.** All Nextel Partners customers receive access to 411 directory assistance service through the Nextel Partners network.

9. **Toll limitation for qualified low-income customers.** As required by the Commission's Rules, Nextel Partners, upon designation as an ETC, will make available to qualifying low-income customers a solution that assists these low-income persons to control their telephone costs.⁵ Nextel Partners is fully capable of providing such a toll limiting service to its customers. Nextel Partners does not presently offer a toll limitation feature, because it is not an ETC. Upon designation as an ETC, Nextel Partners will participate in, and offer, LifeLine and Link-Up programs as required by applicable law. In accordance with Section 54.401(b) of the Commission's Rules, 47 C.F.R. § 54.401(b), Nextel Partners will not disconnect Lifeline service for non-payment of toll charges.

C. **The Georgia Public Service Commission Does Not Regulate CMRS Service**

A carrier seeking designation as an ETC must typically request such a designation from the applicable state regulatory commission. However, the Georgia Public Service Commission (the "GPSC") does not regulate CMRS carriers such as Nextel Partners for the purpose of making ETC determinations. A letter from the GPSC evidencing the fact that the GPSC does not

⁵ *Id.* at 8821-22.

regulate CMRS carriers, and in particular, does not accept jurisdiction over Nextel Partners for the purpose of an ETC status determination, is attached to this Petition as **Attachment 2**. This letter meets the Commission's specific requirements, in that it specifies that Nextel Partners is not subject to regulation in the State of Georgia for purposes of determinations concerning eligibility for ETC status. Nextel Partners accordingly requests that the FCC designate Nextel Partners as "a common carrier providing telephone exchange service and exchange access that is not subject to the jurisdiction of a state commission" pursuant to 47 U.S.C. § 214(e)(6).

D. Nextel Partners Will Advertise the Availability of Supported Services

Nextel Partners will advertise the availability of the above-described services and the charges therefore using media of general distribution, in accordance with the requirements of Section 54.201(d)(2) of the Commission's Rules, 47 C.F.R. § 54.201(d)(2). Nextel Partners currently advertises the availability of its services, and will do so for each supported service on a regular basis, in newspapers, and magazines, or on radio and television, that constitute media of general distribution in Designated Areas of the State of Georgia.

II. Nextel Partners Requests Designation Throughout Each of the Designated Areas Within Its Service Coverage

Nextel Partners is not a rural telephone company as defined in Section 153(37) of the Act, 47 U.S.C. § 153(37). Accordingly, Nextel Partners is required to describe the geographic area(s) within which it requests designation as an ETC. Nextel Partners requests designation as an ETC throughout each of the Designated Areas within the State of Georgia, as set forth in **Attachment 1**. As noted above, these Designated Areas consist of study areas of rural telephone companies that Nextel Partners serves and wire centers of non-rural incumbent LECs.⁶ In

⁶ Wireless service is inherently affected by conditions unique to wireless service providers and which conditions do not affect wireline service providers. Geography, atmospheric conditions and man-made radiofrequency and physical structure interference may at

Attachment 3 hereto, Nextel Partners provides a map of its service area, within which Nextel Partners provides service to the Designated Areas listed in **Attachment 1** hereto.⁷ Nextel Partners provides service to the entirety of each rural telephone study area and non-rural ILEC wire center set forth on **Attachment 1**

In the case of the non-rural ILEC wire centers served by Nextel Partners, as discussed immediately below, the Commission may designate Nextel Partners as an ETC without any redefinition of the service areas of the non-rural ILECs.

III. In Accordance with 47 U.S.C. § 214(e)(6), Nextel Partners Is Entitled to Be Designated as an ETC in Non-Rural Wire Centers

To the extent Nextel Partners is serving non-rural wire centers and providing the services set forth in Section I of the present Petition as required by Section 214(e) the Act and the Commission's implementing rules, as set forth in 47 C.F.R. Section 54.201(c), Nextel Partners is entitled to be granted ETC status by the Commission with respect to the non-rural wire centers attached hereto as **Attachment 1**. See 47 U.S.C. § 214(e)(6).

IV. Designation of Nextel Partners as an ETC for the Designated Areas Served by a Rural Telephone Company In the State of Georgia Would Serve the Public Interest

Certain of the Designated Areas in which Nextel Partners seeks certification are areas served by rural telephone companies as defined in Section 153(37) of the Act.⁸ With respect to each of these areas served by a rural telephone company, the Act requires that the Commission determine that Nextel Partners' designation as an ETC in each case is in the public interest.⁹ As

times reduce or increase a wireless user's coverage area. At the same time, the mobility and functionality of wireless phone service adds immense benefits and convenience to wireless users that wireline providers cannot match.

⁷ For purposes of this Petition, the coverage map provided in **Attachment 3** hereto reflects the result of a conservative radiofrequency propagation analysis assuming a three-watt wireless phone at -105 dB.

demonstrated below, Nextel Partners' designation as an ETC would serve the public interest in all of the Designated Areas in a number of ways.

The FCC has determined that "[d]esignation of competitive ETCs promotes competition and benefits consumers in rural and high-cost areas by increasing customer choice, innovative services, and new technologies."¹⁰ This is particularly applicable in the Designated Areas served by rural telephone companies within the State of Georgia, many of which are rural, and in some cases remote, areas that may not presently be served by competitive wireline carriers that could provide a viable alternative to the incumbent LEC. Designation of Nextel Partners as an ETC will provide a valuable alternative to the existing telecommunications regime in these areas, including a larger local calling area, the benefits of mobile telephony service and, where requested by the PSAP, GPS location assistance for customers calling 911.

In addition, designation of Nextel Partners as an ETC will provide an incentive to the incumbent LECs in all of the Designated Areas to improve their existing networks in order to remain competitive, resulting in improved services to consumers. Designation of Nextel Partners as an ETC in each case will also benefit consumers because support to services provided by Nextel Partners will help assure that quality services are available at "just, reasonable, and affordable rates" as envisioned in the Act.¹¹

Designation of Nextel Partners as an ETC will also serve the public interest in all of the Designated Areas because Nextel Partners will provide all of the supported services required by

⁸ See Attachment 1 hereto.

⁹ See 47 U.S.C. § 214(e)(2).

¹⁰ See *Western Wireless Corporation Petition for Designation as an Eligible Telecommunications Carrier in the State of Wyoming*, Memorandum Opinion and Order, CC Docket No. 96-45, 16 FCC Rcd 48, 55 (2000).

¹¹ See 47 U.S.C. § 254(b)(1).

applicable law, will participate in the LifeLine and Link-Up programs as required by the FCC's Rules, and will otherwise comply with all FCC Rules governing universal service programs, which are designed to ensure that the public interest standards of the Act are achieved. Allowing Nextel Partners access to universal service subsidies will allow Nextel Partners to continue to enhance and expand its network infrastructure to better serve consumers in underserved, high-cost areas of the State of Georgia, and to compete with other carriers on a level regulatory playing field.

Finally, designation of Nextel Partners as an ETC will serve the public interest by further promoting the extensive role Nextel Partners plays in the provision of communications services to Georgia public schools, libraries and local, state and federal government agencies, specifically law enforcement. At the time of this filing, Nextel Partners is the wireless service to 5 Georgia colleges, school districts and libraries, 39 divisions of Federal Government and armed services in Georgia, and over 41 local government agencies, extensively including police, fire and similar first-responders.

Accordingly, designation of Nextel Partners as an ETC will serve the public interest.

V. Anti-Drug Abuse Certification

No party to this Petition is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862.¹²

¹² See Declaration of Donald Manning, Attachment 4 hereto.

VI. High-Cost Loop, Interstate Access, and Interstate Common Line Support

Certification

Under Sections 54.313, 54.314 and 54.904 of the Commission's Rules, as well as 47 C.F.R. § 54.809, carriers wishing to obtain universal service support must either be certified by the appropriate state commission or, where the state commission does not exercise jurisdiction, must self-certify with the Commission and the Universal Service Administrative Company ("USAC") as to their compliance with Section 254(e) of the Act. As explained above, the GPSC does not exercise jurisdiction over CMRS carriers such as Nextel Partners for the purpose of ETC status designations. Therefore, Nextel Partners has submitted its high-cost loop interstate access and interstate common line support certification letters with the Commission and with USAC. Copies of these certifications are attached hereto as **Attachment 5**. Nextel Partners respectfully requests that the Commission issue a finding that Nextel Partners has met the high-cost, interstate access and interstate common lines support certification requirement and that Nextel Partners is, therefore, entitled to begin receiving such support, where available, as of the date it receives a grant of ETC status in order that funding will not be delayed.¹³

VII. Conclusion

Because the requirements for eligibility for designation as an eligible telecommunications carrier have been met, Nextel Partners requests that the Commission promptly grant this Petition.

¹³ See *Guam and Cellular Paging, Inc. Petition for Waiver of FCC Rule Section 54.314*, filed February 6, 2002.

Respectfully submitted,

NPCR, INC. d/b/a NEXTEL PARTNERS

By



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Ronald J. Jarvis

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Counsel for Nextel Partners

Date: July 10, 2003

ATTACHMENT 1

Designated Areas for which Nextel Partners
seeks ETC designation in this Petition

1. Rural Telephone Company Study Areas

220338 Quincy Tel Co-GA Div
220348 Bulloch County Rural
220355 Citizens Tel Co.-GA
220365 Glenwood Tel Co
220369 Comsouth Telecomm
220371 Interstate Tel. Co.
220376 Pembroke Tel Co
220377 Pineland Tel Coop
220378 Planters Rural Coop
220379 Plant Tel Co
220380 Progressive Rural
220381 Public Service Tel
220387 Frontier of GA
220392 Waverly Hall LLC
220395 Accucom Telecom

2. Non-Rural ILEC Wire Centers

225192 BellSouth - GA

ADAIRSVL
ALBANY
ATHENS
ATLANTA
ATLANTA NE
ATLANTA NW
ATLANTA SO
AUGUSTA

225192 BellSouth – GA, (continued)

BAINBRIDGE

BARNESVL

BLACKSHEAR

BOWDON

BRUNSWICK

BUFORD

CALHOUN

CAMILLA

CARROLLTON

CARTERSVL

CLAXTON

COCHRAN

COLUMBUS

CONCORD

CONYERS

CORDELE

COVINGTON

CUMMING

CUSSETA

DUBLIN

EASTMAN

EATONTON

FLOWEYBRCH

FORSYTH

FORTVALLEY

FRANKLIN

GAINESVL

GRANTVILLE

GREENSBORO

GREENVILLE

225192 BellSouth – GA, (continued)

GRIFFIN

HAMILTON

HAZLEHURST

HOGANSVL

JACKSON

JESUP

LAGRANGE

LAKE PARK

LEESBURG

LUMPKIN

LUTHERSVL

MACON

MADISON

MONTICELLO

NEWNAN

NEWTON

PELHAM

PINE MT

RICHLAND

ROCKMART

ROME

ROYSTON

SANDERSVL

SAVANNAH

SENOIA

SMITHVILLE

SOCIALCRCL

SPARKS

SPARTA

SWAINSBORO

225192 BellSouth – GA, (continued)

SYLVESTER

THOMASVL

TIFTON

VALDOSTA

VIDALIA

VILLA RICA

WARNERRBNS

WRENS

WRIGHTSVL

ATTACHMENT 2

Letter from the Georgia Public Service Commission
Declining Jurisdiction over Nextel Partners for ETC Designation

COMMISSIONERS

ROBERT B. BAKER, JR., CHAIRMAN
DAVID L. BURGESS
H. DOUG EVERETT
ANGELA E. SPEIR
STAN WISE

DEBORAH K. FLANNAGAN
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Georgia Public Service Commission

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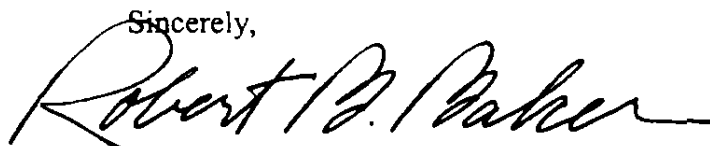
July 2, 2003

To Whom It May Concern

In response to a letter filed on April 3, 2003 by legal counsel for NPCR, Inc. d/b/a Nextel Partners ("Nextel Partners"), the Georgia Public Service Commission hereby affirmatively states that the State of Georgia does not exercise jurisdiction over Commercial Mobile Radio Service providers for purposes of making determinations concerning eligibility for Eligible Telecommunications Carrier designations under 47 U.S.C. Section 214(e) and 47 C.F.R. Section 54.201 *et seq*.

In particular, the Georgia Public Service Commission affirms that Nextel Partners is not subject to jurisdiction of the State of Georgia for purposes of the foregoing determination.

Sincerely,



Robert B. Baker, Jr., Chairman
Georgia Public Service Commission

cc: David L. Burgess, Commissioner, GPSC
H. Doug Everett, Commissioner, GPSC
Angela E. Speir, Commissioner, GPSC
Stan Wise, Commissioner, GPSC
Tom Bond, Director Utilities Division, GPSC
Leon Bowles, Director Telecommunications, GPSC

Kristy Holley, CUC

Ronald J. Jarvis
Counsel for Nextel Partners
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3221 M Street, NW
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ATTACHMENT 3

Map of Nextel Partners' coverage areas
in the State of Georgia

**Nextel Partners
Georgia Coverage
Red Cloud=Coverage Area
Pink=Major Highways
Other Colors=LEC Territories**

NASHVILLE

Greensboro

Charlotte

Chattanooga

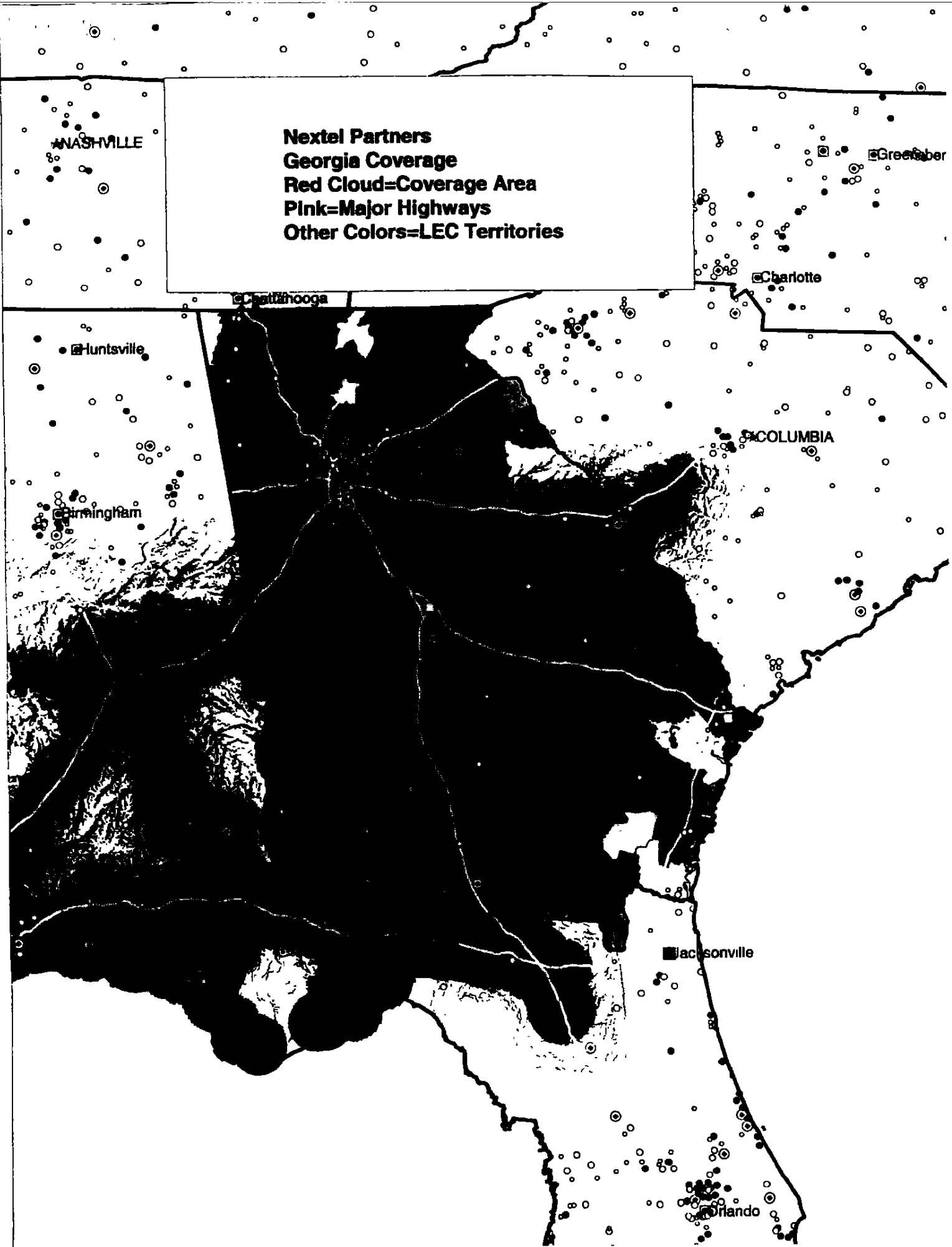
Huntsville

COLUMBIA

Birmingham

Jacksonville

Orlando



ATTACHMENT 4

Declaration of Donald Manning

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Federal-State Joint Board on)	File No _____
Universal Service)	
)	
NPCR, INC. d/b/a NEXTEL PARTNERS)	
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Petition for Designation as an)	
Eligible Telecommunications Carrier)	
in the State of Georgia)	
_____)	

Declaration of Donald Manning

I, the undersigned Donald J. Manning, do hereby declare under penalty of perjury as follows:

1. I serve as Vice-President and General Counsel for Nextel Partners, Inc. ("Nextel Partners") and each of its subsidiary companies, including, but not limited to, NPCR, Inc. d/b/a Nextel Partners.

2. NPCR, Inc. is a wholly-owned, operational-arm subsidiary of Nextel Partners Operating Corp., which is a wholly-owned, operational subsidiary of Nextel Partners, Inc.

3. Nextel Partners, Inc. is a publicly-traded company with its common stock listed on the Nasdaq market, and is broadly owned by both institutional and individual investors.

4. Nextel Partners, Inc.'s President is John Chapple. Vice Presidents include Don Manning, Perry Satterlee, John Thompson, Mark Fanning, and Dave Aas. Entities with 5% or more equity positions with Nextel Partners, Inc. include: Credit Suisse First Boston through several funds held by DLJ Merchant Banking, Madison Dearborn Partners, Wellington Management Co., Eagle River Investments, Motorola, Cascade Investments (an investment company controlled by William H. Gates, III), and Nextel Communications, Inc.

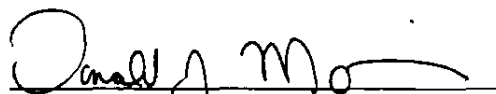
5. This Declaration is submitted in support of Nextel Partners' "Petition for Designation As an Eligible Telecommunications Carrier," to which this Declaration is appended.

6. I declare and certify as follows, and as described in the aforementioned Petition, that: Nextel Partners offers, or will offer, all of the services designated by the FCC for support pursuant to Section 254(c)(3) of the Act; that Nextel Partners offers, or will offer, the supported services using its own facilities; and that Nextel Partners advertises, or will advertise, the availability of supported services and the charges therefore using media of general distribution as described in the annexed Petition.

7. I further declare that I have reviewed the annexed Petition and that the facts stated therein, of which I have personal knowledge, are true and correct to the best of my knowledge and belief.

8. I further declare that to the best of my knowledge, Nextel Partners, including all officers, directors, or persons holding 5% or more of the outstanding stock or shares (voting and/or nonvoting) of Nextel Partners as specified in Section 1.2002(b) of the Commission's Rules are not subject to denial of federal benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U S C. Section 862

I declare under penalty of perjury that the foregoing is true and correct to the best of my information and belief

A handwritten signature in black ink, appearing to read "Donald J. Manning", written over a horizontal line.

Donald J. Manning
Vice President and General Counsel
NPCR, Inc. d/b/a Nextel Partners

Dated: July 8, 2003

ATTACHMENT 5

High-Cost Loop, Interstate Access, and
Interstate Common Line Support Certifications

April 3, 2003

Via FedEx

Irene M. Flannery
VP—High Cost and Low Income Division
USAC
2120 L Street, NW, Suite 600
Washington, DC 20037

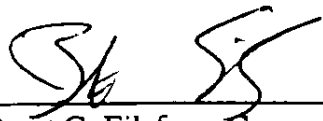
Marlene H. Dortch
Office of the Secretary
FCC
445 – 12th Street, SW
Washington, DC 20554

Re: CC Docket No. 96-45
High Cost Loop Support
Initial Certification Filing

This is to certify pursuant to 47 C.F.R. §§54.313 and 54.314 that NPCR, Inc., d/b/a Nextel Partners, will use any Universal Service High Cost Loop Support received in 2003 only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

I am authorized to make this certification on behalf of Nextel Partners. This certification is for the following study areas in the **State of Georgia**:

220338 Quincy Tel Co-GA Div
220348 Bulloch County Rural
220355 Citizens Tel Co.-GA (part)
220356 Coastal Utilities
220357 Alltel Georgia Inc. (part)
220365 Glenwood Tel Co
220369 Comsouth Telecomm
220376 Pembroke Tel Co
220377 Pineland Tel Coop
220378 Planters Rural Coop
220379 Plant Tel Co
220380 Progressive Rural
220381 Public Service Tel
220392 Waverly Hall LLC
220395 Accucom Telecom
223036 Georgia Alltel Telco
223037 Alltel Georgia Comm



Brent G. Eilefson, Corporate Counsel
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June 27, 2003

Irene M. Flannery
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Universal Service Administrative Company
2120 L Street, NW, Suite 600
Washington, DC 20037

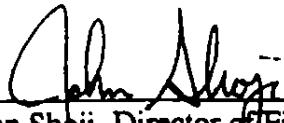
Marlene H. Dortch
Office of the Secretary
Federal Communication Commission
445 – 12th Street, SW
Washington, DC 20554

Re: CC Docket No. 96-45
Interstate Common Line Support and Long Term Support-ICLS
Annual Certification Filing

This is to certify that NPCR, Inc., d/b/a Nextel Partners, will use its Interstate Common Line Support and Long Term Support-ICLS only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

I am authorized to make this certification on behalf of Nextel Partners. This certification is for the study areas located in the **State of Georgia** listed below:

<u>SAC</u>	<u>Company Name</u>	<u>State</u>
220338	Quincy Tel Co - GA Div	GA
220348	Bulloch County Rural	GA
220355	Citizens Tel Co. - GA	GA
220365	Glenwood Tel Co	GA
220369	Comsouth Telecomm	GA
220371	Interstate Tel. Co.	GA
220376	Pembroke Tel. Co.	GA
220377	Pineland Tel Coop	GA
220378	Planters Rural Coop	GA
220379	Plant Tel. Co.	GA
220380	Progressive Rural	GA
220381	Public Service Tel.	GA
220387	Frontier of GA	GA
220392	Waverly Hall LLC	GA
220395	Accucom Telecom	GA
220357	Altel Georgia Inc.	GA
223036	Georgia Altel Telco.	GA
223037	Altel Georgia Comm.	GA
225192	BellSouth - GA	GA


John Sheji, Director of Finance
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Kirkland, WA 98033
(425) 576-3692

Date: 6/27/03

June 27, 2003

Irene M. Flannery
VP—High Cost and Low Income Division
Universal Service Administrative Company
2120 L Street, NW, Suite 600
Washington, DC 20037


Marlene H. Dortch
Office of the Secretary
Federal Communication Commission
445 – 12th Street, SW
Washington, DC 20554

Re: CC Docket No. 96-45
Interstate Access Support - IAS
Annual Certification Filing

This is to certify that NPCR, Inc., d/b/a Nextel Partners, will use its Universal Service Interstate Access Support - IAS only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

I am authorized to make this certification on behalf of Nextel Partners. This certification is for the following study areas in the State of Georgia:

<u>SAC</u>	<u>Company Name</u>	<u>State</u>
220338	Quincy Tel Co. - GA Div	GA
220348	Bulloch County Rural	GA
220355	Citizens Tel Co. - GA	GA
220365	Glenwood Tel Co	GA
220369	Comsouth Telecomm	GA
220371	Interstate Tel. Co.	GA
220376	Pembroke Tel. Co.	GA
220377	Pineland Tel Coop	GA
220378	Planters Rural Coop	GA
220379	Plant Tel. Co.	GA
220380	Progressive Rural	GA
220381	Public Service Tel.	GA
220387	Frontier of GA	GA
220392	Waverly Hall LLC	GA
220395	Accucom Telecom	GA
220357	Alltel Georgia Inc.	GA
223036	Georgia Alltel Telco.	GA
223037	Alltel Georgia Comm.	GA
225192	BellSouth - GA	GA



John Shoji, Director of Finance
NPCR, Inc. d/b/a Nextel Partners
4500 Carillon Point
Kirkland, WA 98033
(425) 576-3692

Date: 6/27/03

CERTIFICATE OF SERVICE

The undersigned, an attorney in the law firm of Catalano & Plache, PLLC hereby certifies that on this tenth day of July, 2003, a true and correct photocopy of the foregoing "Petition" was sent to the following persons:

Richard Smith
Accounting Policy Division
Federal Communications Commission
445 12th Street, SW
Room 5-A660
Washington, DC 20554
(By hand delivery)

Paul Garnett, Esq.
Wireline Competition Bureau
Telecommunications Access Policy Division
Federal Communications Commission
445 12th Street, SW
Room 5-C-315
Washington, DC 20554
(By hand delivery)

Elizabeth Franklin
Wireline Competition Bureau
Telecommunications Access Policy Division
Federal Communications Commission
445 12th Street, SW
Room 4-C-405
Washington, DC 20554
(By hand delivery)



Ronald J. Jarvis

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JUL 10 2003

Federal Communications Commission
Bureau / Office

TO:

Paul Garnett, Esq.
Wireline Competition Bureau
Telecommunications Access Policy Division
Federal Communications Commission
445 12th Street, SW
Room 5-C-315
Washington, DC 20554